EAST PENN MFG CO INC/BATTERY ASSEMBLY



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: September 15, 2004 Effective Date: September 15, 2004

Expiration Date: December 31, 2005

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to construct, install, modify or reactivate the air emission source(s) more fully described in the site inventory list. This Facility is subject to all terms and conditions specified in this plan approval. Nothing in this plan approval relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each plan approval condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated as "State-Only" requirements.

Plan Approval No. 06-05069E

Federal Tax Id - Plant Code: 23-1315454-1

Plan Approval Description

This Plan Approval is issued for the construction of a Lead (Red) Oxide Storage Silo at Plant A-2, the modification of four existing lead grid casters and associated lead pot at Plant A-2, the construction of a new battery assembly operation at Plant A-2 and the construction of a replacement battery formation operation at Plant A-2.

Owner Information

Name: EAST PENN MANUFACTURING CO.

Mailing Address: DEKA RD PO BOX 147

PO BOX 147

LYON STATION, PA 19536

Plant Information

Plant: EAST PENN MFG CO INC/BATTERY ASSEMBLY

Location: 06 Berks County 06953 Richmond Township

SIC Code: 3691 Manufacturing - Storage Batteries

Responsible Official

Name: TROY GREISS

Title: DIR, ENVL HEALTH & SAFETY

Phone: (610) 682 - 6361

Plan Approval Contact Person

Name: ERIC G PEFFEL
Title: ENV H&S ENGINEER
Phone: (610) 682 - 6361

[Signature] _____

LEIF ERICSON, SOUTHCENTRAL REGION AIR PROGRAM MANAGER





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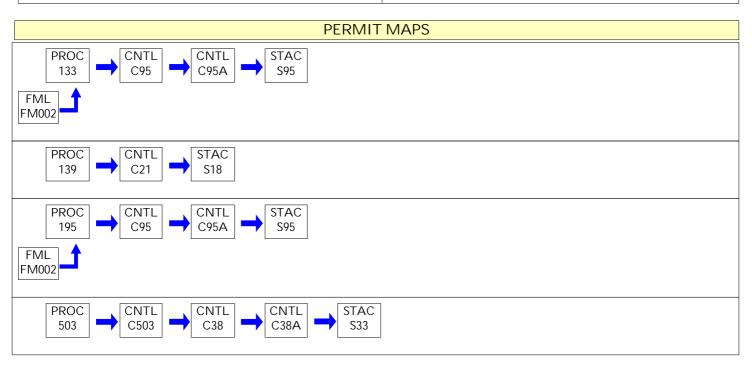
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SECTION A. Plan Approval Inventory List

| Source ID | Source Name | Capacity/Throughput | Fuel/Material |
|-----------|--|---------------------|---------------|
| 133 | A-2 GRID CASTING | | |
| 139 | A-2 BATTERY FORMATION | | |
| 195 | GROUP ASSEMBLY #3 SYSTEM (GROUND) A-2 | | |
| 503 | RED LEAD OXIDE STORAGE BIN - A-2 | | |
| C21 | SCRUBBERS: A-2 BATTERY FORMATION | | |
| C38 | FABRIC COLLECTOR: FARR TENKAY 156L A-2 | | |
| C38A | HEPA: A-2 ASSEMBLY & RED LEAD OXIDE SILO | | |
| C503 | FABRIC COLLECTOR: A-2 RED LEAD OXIDE | | |
| C95 | FABRIC COLLECTOR: A-2 LL #3 ASSEMBLY(SCIENTI | | |
| C95A | HEPA: A-2 LL #3 ASSEMBLY | | |
| FM002 | NATURAL GAS PIPELINE | | |
| S18 | STACK: A-2 BATTERY FORMATION | | |
| S33 | UNSPECIFIED NAME | | |
| S95 | STACK: #3 ASSEMBLY LOWER LEVEL A-2 (SCIENTIF | | |





#001 [25 Pa. Code § 121.1]

Definitions

Words and terms that are not otherwise defined in this plan approval shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.12b (a) (b)]

Future Adoption of Requirements

The issuance of this plan approval does not prevent the future adoption by the Department of any rules, regulations or standards, or the issuance of orders necessary to comply with the requirements of the Federal Clean Air Act or the Pennsylvania Air Pollution Control Act, or to achieve or maintain ambient air quality standards. The issuance of this plan approval shall not be construed to limit the Department's enforcement authority.

#003 [25 Pa. Code § 127.12b]

Plan Approval Temporary Operation

This plan approval authorizes temporary operation of the source(s) covered by this plan approval provided the following conditions are met.

- (a) When construction, installation, modification, or reactivation is being conducted, the permittee should provide written notice to the Department of the completion of the activity approved by this plan approval and the permittee's intent to commence operation at least five (5) working days prior to the completion of said activity. The notice shall state when the activity will be completed and when the permittee expects to commence operation. When the activity involves multiple sources on different time schedules, notice is required for the commencement of operation of each source.
- (b) Pursuant to 25 Pa. Code § 127.12b (d), temporary operation of the source(s) is authorized to facilitate the shakedown of sources and air cleaning devices, to permit operations pending the issuance of a permit under 25 Pa. Code Chapter 127, Subchapter F (relating to operating permits) or Subchapter G (relating to Title V operating permits) or to permit the evaluation of the air contaminant aspects of the source.
- (c) This plan approval authorizes a temporary operation period not to exceed 180 days from the date of commencement of operation, provided the Department receives notice from the permittee pursuant to paragraph (a), above.
- (d) The permittee may request an extension of the 180-day shakedown period if further evaluation of the air contamination aspects of the source(s) is necessary. The request for an extension should be submitted, in writing, to the Department at least 15 days prior to the end of the initial 180-day shakedown period and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance, and the reasons compliance has not been established. This temporary operation period will be valid for a limited time and may be extended for additional limited periods, each not to exceed 120 days.

If, at any time, the Department has cause to believe that air contaminant emissions from the sources listed in this plan approval may be in excess of the limitations specified in, or established pursuant to this plan approval or the permittee's operating permit, the permittee may be required to conduct test methods and procedures deemed necessary by the Department to determine the actual emissions rate. Such testing shall be conducted in accordance with 25 Pa. Code Chapter 139, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.

#004 [25 Pa. Code § 127.12(a) (10)]

Content of Applications

The permittee shall maintain and operate the sources and associated air cleaning devices in accordance with good engineering practice as described in the plan approval application submitted to the Department.

#005 [25 Pa. Code §§ 127.12(c) and (d) & 35 P.S. § 4013.2]

Public Records and Confidential Information

- (a) The records, reports or information obtained by the Department or referred to at public hearings shall be available to the public, except as provided in paragraph (b) of this condition.
- (b) Upon cause shown by the permittee that the records, reports or information, or a particular portion thereof, but not





emission data, to which the Department has access under the act, if made public, would divulge production or sales figures or methods, processes or production unique to that person or would otherwise tend to affect adversely the competitive position of that person by revealing trade secrets, including intellectual property rights, the Department will consider the record, report or information, or particular portion thereof confidential in the administration of the act. The Department will implement this section consistent with sections 112(d) and 114(c) of the Clean Air Act (42 U.S.C.A. § § 7412(d) and 7414(c)). Nothing in this section prevents disclosure of the report, record or information to Federal, State or local representatives as necessary for purposes of administration of Federal, State or local air pollution control laws, or when relevant in a proceeding under the act.

#006 [25 Pa. Code § 127.13]

Plan Approval Extensions

- (a) This plan approval will be valid for a limited time, as specified by the expiration date contained on Page 1 of this plan approval. Except as provided in § § 127.11a and 127.215 (relating to reactivation of sources; and reactivation), at the end of the time, if the construction, modification, reactivation or installation has not been completed, a new plan approval application or an extension of the previous approval will be required.
- (b) If construction has commenced, but cannot be completed before the expiration of this plan approval, an extension of the plan approval must be obtained to continue construction. To allow adequate time for departmental action, a request for the extension should be postmarked at least thirty (30) days prior to the expiration date. The Department will not issue an extension after the plan approval expires. The request for an extension should include the following:
 - (i) A justification for the extension,
 - (ii) A schedule for the completion of the construction

If construction has not commenced before the expiration of this plan approval, then a new plan approval application must be submitted and approval obtained before construction can commence.

(c) If the construction, modification or installation is not commenced within 18 months of the issuance of this plan approval or if there is more than an 18-month lapse in construction, modification or installation, a new plan approval application that meets the requirements of 25 Pa. Code Chapter 127, Subchapter B (related to plan approval requirements), Subchapter D (related to prevention of significant deterioration of air quality), and Subchapter E (related to new source review) shall be submitted.

#007 [25 Pa. Code § 127.32]

Transfer of Plan Approvals

- (a) This plan approval may not be transferred from one person to another except when a change of ownership is demonstrated to the satisfaction of the Department and the Department approves the transfer of the plan approval in writing.
- (b) Section 127.12a (relating to compliance review) applies to a request for transfer of a plan approval. A compliance review form shall accompany the request.
- (c) This plan approval is valid only for the specific source and the specific location of the source as described in the application.

#008 [25 Pa. Code § 127.12(4) & 35 P.S. § 4008 & § 114 of the CAA]

Inspection and Entry

- (a) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.
- (b) The permittee shall also allow the Department to have access at reasonable times to said sources and associated air cleaning devices with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act and regulations adopted under the act.
- (c) Nothing in this plan approval condition shall limit the ability of the Environmental Protection Agency to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.





#009 [25 Pa. Code 127.13a]

Plan Approval Changes for Cause

This plan approval may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

- (a) The permittee constructs or operates the source subject to the plan approval in violation of the act, the Clean Air Act, the regulations promulgated under the act or the Clean Air Act, a plan approval or permit or in a manner that causes air pollution.
- (b) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (c) The permittee fails to submit a report required by this plan approval.
- (d) The Environmental Protection Agency determines that this plan approval is not in compliance with the Clean Air Act or the regulations thereunder.

#010 [25 Pa. Code §§ 121.9 & 127.216]

Circumvention

- (a) The permittee, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.
- (b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this plan approval, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#011 [25 Pa. Code § 127.12c]

Submissions

Reports, test data, monitoring data, notifications shall be submitted to the:

Regional Air Program Manager

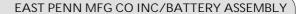
PA Department of Environmental Protection

(At the address given on the plan approval transmittal letter or otherwise notified)

#012 [25 Pa. Code § 127.12(9) & 40 CFR Part 68]

Risk Management

- (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).
- (b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the facility. The permittee shall submit the RMP to the Environmental Protection Agency according to the following schedule and requirements:
- (1) The permittee shall submit the first RMP to a central point specified by the Environmental Protection Agency no later than the latest of the following:
 - (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
 - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.
- (2) The permittee shall submit any additional relevant information requested by the Department or the Environmental Protection Agency concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR §







68.190.

- (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.
- (c) As used in this plan approval condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

No person may permit the emission into the outdoor atmosphere of fugitive air contaminants from a source other than the following:

- a. Construction or demolition of buildings or structures.
- b. Grading, paving and maintenance of roads and streets.
- c. Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- d. Clearing of land.
- e. Stockpiling of materials.

Sources and classes of sources other than those identified in paragraphs (a) - (e), for which the operator has obtained a determination from the Department in accordance with 25 Pa. Code Section 123.1(b) that fugitive emissions from the source, after appropriate control, meet the following requirements:

- (i) The emissions are of minor significance with respect to causing air pollution; and
- (ii) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

002 [25 Pa. Code §123.2]

Fugitive particulate matter

No person shall permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in the preceding permit Condition #001, Section C, if such emissions are visible at the point the emissions pass outside the person's property.

003 [25 Pa. Code §123.31]

Limitations

No person shall emit any malodorous air contaminants into the outdoor atmosphere from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

II. TESTING REQUIREMENTS.

004 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured by using either of the following:

- 1. A device approved by the Department and maintained to provide accurate opacity measurements.
- 2. Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

005 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The Department reserves the right to require exhaust stack testing of any source as necessary during the permit term to verify



06-05069E



SECTION C. Site Level Plan Approval Requirements

emissions for purposes including emission fees, malfunctions or permit condition violations.

006 [25 Pa. Code §127.12b] Plan approval terms and conditions.

[Additional authority for this condition is derived from 40 CFR Part 60, Section 60.374]

At least 60 days prior to the test, the permittee shall submit to the Department for approval, the procedures for the testing and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

007 [25 Pa. Code §127.12b] Plan approval terms and conditions.

[Additional authority for this condition is derived from 40 CFR Part 60, Section 60.374]

At least 30 days prior to the testing, the Regional Air Quality Program Manager or a representative shall be informed of the date and time of the testing.

008 [25 Pa. Code §127.12b] Plan approval terms and conditions.

[Additional authority for this condition is derived from 40 CFR Part 60, Section 60.374]

Within 60 days after the source testing, three copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Program Manager or a representative for approval.

009 [25 Pa. Code §139.1] Sampling facilities.

Upon the request of the Department, the permittee shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance by the Department of tests on such source. The Department will set forth, in the request, the time period in which the facilities shall be provided as well as the specifications for such facilities.

III. MONITORING REQUIREMENTS.

010 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall conduct a weekly inspection of the sources covered by this approval during the daylight hours when the facility is in production to detect visible emissions, fugitive emissions and malodors as follows:

- 1. Visible emissions in excess of the limits specifically stated in this permit in Section D. Visible emissions may be measured according to the methods specified in Condition #004, Section C. As an alternative, facility personnel who observe such visible emissions shall report each incident to the Department within two hours of each occurrence and make arrangements for a certified observer to read the visible emissions.
- 2. Presence of visible fugitive emissions and fugitive particulate matter beyond the plant property boundaries, as stated in Condition #002, Section C.
- 3. Presence of odors beyond the facility property boundaries that have the potential to be malodorous as stated in Condition #003, Section C.



IV. RECORDKEEPING REQUIREMENTS.

011 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall record the results of the weekly inspections around the facility on the Department approved check sheets. The check sheets shall be made available to the Department upon request. The sheets shall be maintained in an acceptable manner.

012 [25 Pa. Code §127.12b] Plan approval terms and conditions.

With the issuance of this approval, the Department approves the check sheet submitted by the permittee in their August 13, 2004, letter.

V. REPORTING REQUIREMENTS.

013 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall notify the Reading District Office of the initial startup of each new source and the completion of each modification.

014 [25 Pa. Code §127.12b] Plan approval terms and conditions.

[Additional authority for this permit condition is derived from 25 PA Code Chapters 122 and 40 CFR Part 60 Sections 60.19]

- a. The permittee shall report each malfunction to the Department that occurs with these sources. For purposes of this condition, a malfunction is any sudden, infrequent and not reasonably preventable failure of the air pollution control equipment, process equipment, or process to operate in a normal or usual manner that may result in an increase in air emissions above minor significance.
- b. When malfunctions pose an imminent danger to public health and safety or harm to the environment, the notification shall be submitted to the Department no later than two (2) hours after the incident is detected by the permittee.
 - 1. The notice shall describe the:
 - Name and location of the facility;
 - ii. Nature and cause of the malfunction or breakdown;
 - iii. Time when the malfunction or breakdown was first observed:
 - iv. Expected duration of excess emissions; and
 - v. Estimated rate of emissions.
 - 2. The permittee shall notify the Department immediately when corrective measures have been accomplished.
- 3. Subsequent to the malfunction, the permittee shall submit a full report of the malfunction to the Department within fifteen (15) days, if requested.
- c. Malfunctions shall be reported to the Department at the following address:

PA DEP, Reading District Office Air Quality Program





1001 Cross Roads Blvd Reading, Pa 19605

Telephone reports can be made to the Air Quality Program at 610-916-0100 during normal business hours or to the Department's Emergency Hotline 888-975-9690 at any time.

VI. WORK PRACTICE REQUIREMENTS.

015 [25 Pa. Code §123.1] Prohibition of certain fugitive emissions

The permittee shall take all reasonable actions to prevent particulate matter from the sources identified in Condition #001, Section C from becoming airborne. These actions shall include, but not be limited to, the following:

- 1. Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads or the clearing of land.
- 2. Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
- 3. Paving and maintenance of roadways.
- 4. Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water or other means.

VII. ADDITIONAL REQUIREMENTS.

016 [25 Pa. Code §123.42] Exceptions

The limitations of 25 Pa. Code Section 123.41 (relating to limitations) do not apply to a visible emission in any of the following instances:

- 1. When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- 2. When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- 3. When the emission results from sources specified in Condition #001, Section C (relating to prohibition of certain fugitive emissions).

017 [25 Pa. Code §127.12b] Plan approval terms and conditions.

. .

This approval is issued for the following actions:

- a. Construction of a red lead oxide storage silo and the installation of a bin vent collector at the Battery Assembly Plant A-2. The silo is to additionally be controlled by an existing fabric collector and HEPA filter known as AIMS control device C38.
- b. Modification of four (4) grid casting machines and their associated lead pot in the Battery Assembly Plant A-2. The modification involves the relocation of the casters within the plant and the routing their exhaust to the existing fabric collector and HEPA filter known as AIMS control device C95.
- c. Construction of a COS Machine and associated assembly equipment in Battery Assembly Plant A-2. The source is to be controlled by an existing fabric collector and HEPA filter known as AIMS control device C95.





d. Construction of a formation operation and mist eliminator (AIMS control device C21). This source replaces the existing formation operation known as Formation #8 and control device.

018 [25 Pa. Code §129.14] Open burning operations

No person shall conduct open burning of materials in such a manner that:

- a. The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.
- b. Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.
- c. The emissions interfere with the reasonable enjoyment of life and property.
- d. The emissions cause damage to vegetation or property.
- e. The emissions are or may be deleterious to human or animal health.

These limits do not apply where the open burning operations result from the following:

- a. A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
- b. Any fire set for the propose of instructing personnel in fire fighting as approved by the Department, provided the permittee has notified the Department of the date, time and place of the training.
- c. A fire set for the prevention and control of disease or pests, when approved by the Department.
- d. A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.
- e. A fire set solely for recreational or ceremonial purposes.
- f. A fire set solely for cooking food.

This permit does not constitute authorization to burn solid waste pursuant to Section 610(3) of the Solid Waste Management Act, 35 P. S. Section 6018.610(3), or any other provision of the Solid Waste Management Act.

VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this plan approval including Section B (relating to Plan Approval General Requirements).

IX. COMPLIANCE SCHEDULE.

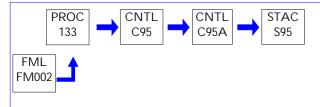
No compliance milestones exist.





Source ID: 133 Source Name: A-2 GRID CASTING

Source Capacity/Throughput:



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall limit the emissions from this operation to the following:

- a. Particulate 0.001 grains per dry standard cubic foot
- b. Lead 0.0001 grains per dry standard cubic foot

002 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.372] Subpart KK - Standards of Performance for Lead-Acid Battery Manufacturing Plants Standards for lead.

The permittee shall not permit the discharge to the atmosphere from this source any gases with an opacity greater than 0 percent.

II. TESTING REQUIREMENTS.

003 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.374] Subpart KK - Standards of Performance for Lead-Acid Battery Manufacturing Plants Test methods and procedures.

Within sixty (60) days after the source has returned to maximum production, but no later than 180 days after the relocation is complete, the permittee shall conduct performance testing as per Section 60.8 and 60.374 of 40 CFR Part 60, Subpart KK and Chapter 139 of the Rules and Regulations of the Department. The testing shall be for lead and visible emissions from the source.

004 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.374] Subpart KK - Standards of Performance for Lead-Acid Battery Manufacturing Plants Test methods and procedures.

The permittee shall use the following test methods for the associated pollutants:

a. Lead - EPA Method 12 from 40 CFR Part 60

b. Opacity - EPA Method 9 from CFR Part 60

Note: Opacity shall be rounded off to the nearest whole number.

005 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.374] Subpart KK - Standards of Performance for Lead-Acid Battery Manufacturing Plants Test methods and procedures.





This testing can be conducted in conjunction with the testing required for the Source 195 and the sources found in Plan Approvals No. 06-5069B and 06-5069C that exhaust to the same control device.

III. MONITORING REQUIREMENTS.

006 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall read and record the pressure differential across the fabric collector and HEPA filter once per week.

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

007 [25 Pa. Code §127.12b] Plan approval terms and conditions.

Equipment (a differential manometer or equivalent, as approved by the Department), shall be provided and maintained so that at any time the pressure drop across the fabric collector and HEPA filter can be measured.

008 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall operate any combustion sources in a manner consistent with good combustion practices.

VII. ADDITIONAL REQUIREMENTS.

009 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.370] Subpart KK - Standards of Performance for Lead-Acid Battery Manufacturing Plants Applicability and designation of affected facility.

The grid casters and lead pot are is subject to Subpart KK of the Standards of Performance for New Stationary Sources and shall comply with all applicable requirements of this Subpart. 40 CFR Section 60.4 requires submission of copies of all requests, reports, applications, submittals and other communications to both EPA and the Department. The EPA copies shall be forwarded to:

Director of Air Protection Division US EPA, Region III 1650 Arch Street Philadelphia, Pa 19103-2029





Source ID: 139

Source Name: A-2 BATTERY FORMATION

Source Capacity/Throughput:



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall limit the emissions from the formation operation to the following:

- a. Sulfuric acid 0.001 grains per dry standard cubic foot
- b. Sulfur dioxide 0.5 ppmv

II. TESTING REQUIREMENTS.

002 [25 Pa. Code §127.12b] Plan approval terms and conditions.

Prior to the issuance of an Operating Permit, and no longer than 180 days after the start-up, the permittee shall perform a stack test on the formation room covered by this plan approval in accordance with the provisions of Chapter 139 to show compliance. The stack test shall be for sulfuric acid mist and visible emissions.

The stack test shall be preformed while the aforementioned source is operating at the maximum rated capacity as stated on the application. If the maximum rate cannot be achieved, the source shall be operated at it maximum normal operation. The permittee shall request approval to operate in this manner

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall use the following test method for the associated pollutant:

- a. Sulfuric acid EPA Method 8 from 40 CFR Part 60
- b. Visible emissions EPA Method 9 from 40 CFR Part 60

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall read and record the pressure drop across the control device once per week.

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).





V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall conduct weekly visible inspections of the control device and associated equipment. This inspection should insure that the collector is operating properly, including the removal of collected material.

006 [25 Pa. Code §127.12b] Plan approval terms and conditions.

Equipment (a differential manometer or equivalent, as approved by the Department), shall be provided and maintained so that at any time the pressure drop across the mist eliminator can be measured.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

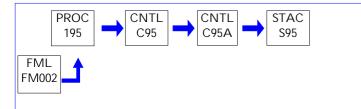




Source ID: 195

Source Name: GROUP ASSEMBLY #3 SYSTEM (GROUND) A-2

Source Capacity/Throughput:



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall limit the emissions from the assembly operations to the following:

- a. Particulate 0.001 grains per dry standard cubic foot
- b. Lead 0.0001 grains per dry standard cubic foot

002 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.372] Subpart KK - Standards of Performance for Lead-Acid Battery Manufacturing Plants Standards for lead.

The permittee shall not permit the discharge to the atmosphere from this source any gases with an opacity greater than 0 percent.

Fuel Restriction(s).

003 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall limit the fuel used by the assembly operation to natural gas or a propane air mix.

II. TESTING REQUIREMENTS.

004 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.374] Subpart KK - Standards of Performance for Lead-Acid Battery Manufacturing Plants Test methods and procedures.

Within sixty (60) days after achieving the maximum production rate at which the sources will be operated, but not later than 180 days after the initial startup of the source, the permittee shall conduct performance testing as per Sections 60.8 and 60.374 of 40 CFR, Part 60, Subpart KK and Chapter 139 of the rules and regulations of the Department. The testing shall be for lead and visible emissions from the assembly operation.

005 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.374] Subpart KK - Standards of Performance for Lead-Acid Battery Manufacturing Plants Test methods and procedures.

The permittee shall use the following test methods to determine the emissions:

- a. Lead EPA Method 12 from 40 CFR Part 60
- b. Opacity EPA Method 9 from 40 CFR Part 60

Note: Opacity shall be rounded off to the nearest whole number.





006 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.374] Subpart KK - Standards of Performance for Lead-Acid Battery Manufacturing Plants Test methods and procedures.

This testing can be conducted in conjunction with the testing required for the Source 133 and the sources found in Plan Approvals No. 06-5069B and 06-5069C that exhaust to the same control device.

III. MONITORING REQUIREMENTS.

007 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall read and record the pressure drop on each control device weekly, while the source is operating.

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

008 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall conduct weekly inspections of the control devices and associated equipment. The inspection shall include at a minimum the following:

- a. Visible inspection of the collectors and the equipment
- b. Proper removal of the collected material

The results and any actions taken shall be recorded along with the date of the inspection.

VII. ADDITIONAL REQUIREMENTS.

009 [25 Pa. Code §127.12b] Plan approval terms and conditions.

Equipment (a differential manometer or equivalent, as approved by the Department), shall be provided and maintained so that at any time the pressure drop across each fabric collector and HEPA filter can be measured.

010 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.370] Subpart KK - Standards of Performance for Lead-Acid Battery Manufacturing Plants Applicability and designation of affected facility.

The assembly operation is subject to Subpart KK of the Standards of Performance for New Stationary Sources and shall comply with all applicable requirements of this Subpart. 40 CFR Section 60.4 requires submission of copies of all requests, reports, applications, submittals and other communications to both EPA and the Department. The EPA copies shall be forwarded to:





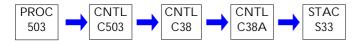
Director of Air Protection Division US EPA, Region III 1650 Arch Street Philadelphia, Pa 19103-2029





Source ID: 503 Source Name: RED LEAD OXIDE STORAGE BIN - A-2

Source Capacity/Throughput:



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall limit the emissions from the silo to the following:

- a. Particulate/PM-10 less than 0.001 grains per dry standard cubic foot
- b. Lead less than 0.0001 grains per dry standard cubic foot

002 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.372] Subpart KK - Standards of Performance for Lead-Acid Battery Manufacturing Plants Standards for lead.

The permittee shall not permit the discharge to the atmosphere from this source any gases with an opacity greater than 0 percent.

II. TESTING REQUIREMENTS.

003 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.374] Subpart KK - Standards of Performance for Lead-Acid Battery Manufacturing Plants Test methods and procedures.

Within sixty (60) days after achieving the maximum production rate at which the source will be operated, but not later then 180 days after the initial start-up of the facility, the permittee shall conduct performance testing as per Section 60.8 and 60.374 of 40 CFR Part 60, Subpart KK and Chapter 139 of the Rules and Regulations of the Department. The testing shall be for visible emissions from the silo during the loading operation.

004 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.374] Subpart KK - Standards of Performance for Lead-Acid Battery Manufacturing Plants Test methods and procedures.

The permittee shall use EPA Teat Method 9 from 40 CFR Part 60 for determining the opacity. The opacity shall be rounded off to the nearest whole number.

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall read and record the pressure drop on each control device monthly, while the silo is being loaded.





IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

006 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall conduct weekly inspections of the control devices and associated equipment. The inspection shall include at a minimum the following:

- a. Visible inspection of the collectors and equipment
- b. Proper removal of the collected material

The permittee is only required to conduct the above inspection once quarterly on the bin vent collector.

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §127.12b] Plan approval terms and conditions.

Equipment (a differential manometer or equivalent, as approval by the Department) shall be provided and maintained so that at any time the pressure drop across the collectors can to be measured.

008 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.370] Subpart KK - Standards of Performance for Lead-Acid Battery Manufacturing Plants Applicability and designation of affected facility.

The silo is subject to Subpart KK of the Standards of Performance for New Stationary Sources and shall comply with all applicable requirements of this Subpart. 40 CFR Section 60.4 requires submission of copies of all requests, reports, applications, submittals and other communications to both EPA and the Department. The EPA copies shall be forwarded to:

Director of Air Protection Division US EPA, Region III 1650 Arch Street Philadelphia, Pa 19103-2029





SECTION E. Alternative Operation Requirements.

No Alternative Operations exist for this Plan Approval facility.





SECTION F. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.



SECTION G. Miscellaneous.



TUD ON

***** End of Report *****